

REMARKS

The Office Action mailed October 10, 2006, has been reviewed and these remarks are responsive thereto. Claims 20, 21 and 27 have been amended. Claims 23-25 and 28 have been amended, but these changes are not substantive. Claims 1-30 remain pending in this application and currently stand rejected.

Claim Rejections Under 35 U.S.C. §103

Claims 1-3, 5, 8-13, 15-17, 19-22, 24-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,956,681 to Yamakita (hereinafter *Yamakita*) in view of U.S. Patent No. 6,868,525 to Szabo (hereinafter *Szabo*). Applicant respectfully traverses the rejection with respect to Claim 1. Claims 20 and 21 have been amended, and Applicant respectfully submits that the amendments overcome this rejection and add no new matter.

Claim 1 recites a computer system for applying mode bias to an input field of an electronic document of an application, the system comprising, *inter alia*, an input engine in communication with the hierarchical based schema registry, wherein the hierarchical based schema registry receives a schema name based on a hierarchical analysis of an input to the input field from the application, locates a grammar having a language setting, a locale setting and associated with the schema name and sends the grammar to the input engine.

Amended Claim 20 recites a computer system for applying mode bias to an input field of an electronic document of an application, the system comprising, *inter alia*, an input engine in communication with the hierarchical based schema registry, wherein the hierarchical based schema registry receives a schema name from the application, locates an identifier of a grammar associated with the schema name and sends the identifier of the grammar to the input engine, wherein the grammar is associated with a highest ranked schema.

Amended Claim 21 recites a computer-implemented method for applying mode bias to an input field of an electronic document of an application program module, the method comprising, *inter alia*, determining a mode bias schema that is attached to the input field, wherein the determination of a mode bias schema uses a ranked list of mode bias schemas associated with an input method.

Yamakita discloses a communication environment using a mobile terminal, a speech recognition function as a user interface of the mobile terminal at a practical accuracy and cost and to enable generation/transmission of an E-mail or FAX document as formatted text data on the basis of the recognition result. (See *Yamakita* column 2, lines 18-23.) *Yamakita* also discloses a formatted text generation section 118 determines a field of the recognized speech text data output from a text speech recognition section 117 using a format type data which is designated from a mobile terminal 101 together with a text speech recognition/formatting start request command, and a format type field dictionary. (See *Yamakita* column 5, lines 34-40.) In addition, *Yamakita* discloses a packet transmission/reception section 115 (FIG. 1) in a speech control host unit 108 recognizes a value set in a "destination port number" field of a TCP header of a received TCP segment, thereby determining an application executed by the speech control host unit 108 as a transfer destination of data stored in the "data" field of the TCP segment. (See *Yamakita* column 16, lines 22-28.)

Szabo discloses a method of visualization of a set of elements in a computer graphic interface, comprising defining a hierarchy of objects, each hierarchal level within the hierarchy having at least one object, the at least one element having one parent hierarchal object and optionally a set of child objects, with a set of content objects populating the hierarchy; defining, based on a user input, a selected object within the hierarchy for examination; and generating a display on the graphic user interface, presenting the selected object element and any child objects thereof; a representation of parental objects within the hierarchy, with a representation of a hierarchal representation thereof; wherein each of the parent and child objects is associated with a hyperlink, a selection of a respective hyperlink serving to transform that element into the selected element, wherein when a content object is selected, an associated set of related objects is displayed. (See *Szabo* column 17 line 55 through column 18 line 6.) *Szabo* also discloses using a user hierarchal schema having documents for providing similar or related information classified together, wherein this similarity or relatedness is not defined intrinsically in the query. (See *Szabo* column 21, lines 38-45.).

The Office Action acknowledges that *Yamakita* fails to teach or suggest a schema registry as a hierarchical based schema registry, and a hierarchical analysis to the input field. In order to overcome this deficiency in *Yamakita*, the Office Action relies on *Szabo*. However, *Szabo* fails

to remedy all the disclosed deficiencies in *Yamakita*. In addition, the Office Action acknowledges that *Yamakita* fails to teach or suggest a grammar having a language setting and a locale setting, but supports the rejection of Claim 1 by asserting Official Notice.

In response to the Office Action's use of Official Notice, Applicant respectfully suggests that the Examiner has failed to make a *prima facie* case of obviousness. In order to make a *prima facie* case of obviousness, the Examiner must set forth prior art, which teach or suggest every claim limitation. (See MPEP § 2143.) There is nothing in the prior art cited by the Examiner that discloses, "a grammar having a language setting and a locale setting", as recited by Claim 1. Accordingly, independent Claim 1 patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claim 1.

If the Examiner continues to rely on this unsupported contention, Applicant respectfully requests the Examiner to provide support. See, In re Zurko, 258 F.3d 1379, 59 U.S.P.Q.2d 1693 (Fed. Cir. 2001) (holding that the USPTO must point to some concrete evidence in the record to support core factual findings in a determination of patentability); Memorandum by Stephen G. Kunin, Deputy Commissioner for Patent Examination Policy (February 21, 2002) (stating that it is never appropriate to rely on common knowledge without evidentiary support as sole or principal evidence on which to base rejection); 37 C.F.R. § 1.104 (providing that when a rejection in an application is based on facts within the personal knowledge of an Examiner, the data should be stated as specifically as possible, *and the facts must be supported*, when called for by the applicant, by an affidavit from the Examiner); MPEP § 2144.03 (providing that the Examiner may only take official notice of facts outside of the record which are capable of instant and unquestionable demonstration as being "well-known" in the art and, if the Applicant traverses such an assertion, the Examiner *should cite a reference* in support of his or her position.).

Dependent Claims 2-19 are also allowable at least for the reasons described above regarding Independent Claim 1, and by virtue of their dependency upon independent Claim 1. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 2-19.

The combination of *Yamakita* and *Szabo* at least fails to teach or suggest an input engine in communication with the hierarchical based schema registry, wherein the hierarchical based schema registry receives a schema name from the application, locates an identifier of a grammar associated with the schema name and sends the identifier of the grammar to the input engine, wherein the grammar is associated with a highest ranked schema, as recited in Claim 20. *Yamakita* fails to teach or suggest ranking schema. The Office Action asserts that *Yamakita* discloses a ranking scheme for schema in FIG.4. The Applicant respectfully disagrees with this assertion because FIG. 4 of *Yamakita* merely discloses a decision tree for detecting an input for various devices and fails to utilize a ranking of schema. In addition, *Yamakita* merely determines if data has been received for a particular device and fails to determine whether the received data for the device is a valid input, much less associating the grammar with a highest ranked schema. Therefore, *Yamakita* fails to utilize a grammar as recited in Claim 21. *Szabo* fails to mention a grammar, much less associating a grammar with a highest ranked schema. Accordingly, independent Claim 20 patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claim 20.

The combination of *Yamakita* and *Szabo* at least fails to teach or suggest determining a mode bias schema that is attached to the input field, wherein the determination of a mode bias schema uses a ranked list of mode bias schemas associated with an input method, as recited in Claim 21. As mentioned above with respect to Claim 20, *Yamakita* fails to teach or suggest using a ranked list of schema. Even assuming *arguendo* that *Yamakita* does disclose a ranked list of schema, *Yamakita* fails to teach or suggest associating the ranked list with an input method because *Yamakita* merely determines data whether has been received for a particular device because *Yamakita* is directed to generating e-mail or facsimile documents using speech recognition, not applying a mode bias to an input field of an electronic document. (See *Yamakita* column 10, lines 1-60.) *Szabo* teaches away from the use of lists presenting information, much less using a ranked list. (See *Szabo* column 7, lines 36-49.) Accordingly, independent Claim 21 patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claim 21. Dependent Claims 22-26 are also allowable at least for the reasons described above regarding Independent Claim 21, and by virtue of their

dependency upon independent Claim 21. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 22-26.

Claims 4, 6, and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Yamakita* in view of *Szabo*, and further in view of U.S. Publication No. 2001/0041328 to Fisher (hereinafter *Fisher*). Applicant respectfully traverses this rejection.

As mentioned above, the combination of *Yamakita* and *Szabo* fails to teach or suggest all the limitations of Claim 1. Accordingly, dependent Claims 4, 6, and 7 are also allowable over the combination of *Yamakita* and *Szabo* at least for the reasons described above regarding Independent Claim 1 and by virtue of their dependency upon independent Claim 1.

Fisher discloses a computer simulation process, apparatus, and multimedia game intended for simulated, foreign travel experiences and simulated, foreign language environments. (See *Fisher* paragraph [0004].) *Fisher* discloses that when a user is running the invention on a computer and is involved in a game session in the invention, the user may cause the media content in the field of view (FIG. 1 (i)) in the game display to show video in which a character is shown or appears or emerges from the image data, and in which the character may initiate communication with the user or in which, the user may initiate communication with the character. (See *Fisher* paragraph [0004].)

The combination of *Yamakita*, *Szabo* and *Fisher* at least fails to teach or suggest an input engine in communication with the hierarchical based schema registry, wherein the hierarchical based schema registry receives a schema name based on a hierarchical analysis of an input to the input field from the application, locates a grammar having a language setting, a locale setting and associated with the schema name and sends the grammar to the input engine, as recited in Claim 1. *Fisher* fails to mention using a schema registry, much less locating a grammar having a language setting, a locale setting and associated with a schema name because *Fisher* is merely directed to a multimedia system for simulating a foreign immersion interaction. Accordingly, independent Claim 1 patentably distinguishes the present invention over the cited art. Dependent Claims 4, 6, and 7 are also allowable at least for the reasons described above regarding independent Claim 1, and by virtue of their dependency upon independent Claim 1.

Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 4, 6, and 7.

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Yamakita* in view of *Szabo* and further in view of U.S. Patent No. 6,434,567 to De La Huerga (hereinafter *De La Huerga '567*). Applicant respectfully traverses this rejection.

As mentioned above, the combination of *Yamakita* and *Szabo* fails to teach or suggest all the limitations of Claim 1. Accordingly, Dependent Claim 14 is also allowable over the combination of *Yamakita* and *Szabo* at least for the reasons described above regarding Independent Claim 1 and by virtue of its dependency upon independent Claim 1.

De La Huerga '567 discloses a system including predefined address format fields and corresponding instantiation rule sets which can be used to quickly define address formats for use by an enterprise computing system. (See *De La Huerga '567* column 6, lines 45-49.) *De La Huerga '567* also discloses a system in which address formats can be specified once for all processing devices (e.g. databases, servers, applications, data collection devices, etc.). (See *De La Huerga '567* column 6, lines 49-52.) In addition, *De La Huerga '567* discloses a VSRS 72 that includes a rule set which is used to search any information set for any date specifying information which can be used to instantiate variable field 62. (See *De La Huerga '567* column 10, lines 7-9.) To this end, VSRS 72 specifies a separate rule corresponding to each possible format in which a date might appear in an information set (see exemplary rules in VSRS 72). (See *De La Huerga '567* column 10, lines 9-12.).

The combination of *Yamakita*, *Szabo* and *De La Huerga '567* at least fails to teach or suggest all the limitations of Claim 1. *De La Huerga '567* fails to teach or suggest an input engine in communication with the hierarchical based schema registry, wherein the hierarchical based schema registry receives a schema name based on a hierarchical analysis of an input to the input field from the application, locates a grammar having a language setting, a locale setting and associated with the schema name and sends the grammar to the input engine, as recited in Claim 1. *De La Huerga '567* fails to mention a grammar, much less a grammar having a language setting, a locale setting and associated with the schema name. Accordingly, independent Claim 1 patentably distinguishes the present invention over the cited art. Dependent Claim 14 is also

allowable at least for the reasons described above regarding Independent Claim 1, and by virtue of its dependency upon independent Claim 1. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claim 14.

Claims 18 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Yamakita* in view of *De La Huerga*, U.S. Patent No. 5,895,461 (hereinafter *De La Huerga '461*). Applicant respectfully submits that the amended claims overcome this rejection and add no new matter.

As mentioned above, *Yamakita* fails to teach or suggest all the limitations of Claims 1 and 21. Accordingly, Dependent Claims 18 and 23 are also allowable over *Yamakita* at least for the reasons described above regarding Independent Claim 1 and 21, respectively, and by virtue of their dependency upon independent Claims 1 and 21.

De La Huerga '461 discloses a specialized word processor for accepting and recognizing keywords input by the creator of a data record and storing the record at a predetermined location which will be referenced by a hypertext link associated with the keywords. (See *De La Huerga '461* column 6, lines 33-39.) *De La Huerga '461* also discloses that the specialized word processor checks the format of data for the proper length and corrects characters input by a user. See *De La Huerga '461* column 6, lines 50-55.)

The combination of *Yamakita* and *De La Huerga '461* at least fails to teach or suggest all the limitations of Claim 1. *De La Huerga '461* fails to teach or suggest an input engine in communication with the hierarchical based schema registry, wherein the hierarchical based schema registry receives a schema name based on a hierarchical analysis of an input to the input field from the application, locates a grammar having a language setting, a locale setting and associated with the schema name and sends the grammar to the input engine, as recited in Claim 1. *De La Huerga '461* fails to mention a grammar, much less a grammar having a language setting, a locale setting and associated with the schema name. Accordingly, independent Claim 1 patentably distinguishes the present invention over the cited art. Dependent Claim 18 is also allowable at least for the reasons described above regarding independent Claim 1, and by virtue of its dependency upon independent Claim 1. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claim 18.

The combination of *Yamakita* and *De La Hueraga '461* at least fails to teach or suggest determining a mode bias schema that is attached to the input field, wherein the determination of a mode bias schema uses a ranked list of mode bias schemas associated with an input method, as recited in Claim 21. *De La Hueraga '461* fails to mention a mode bias schema, much less a determination using a ranked list of mode bias schemas associated with an input method. Accordingly, independent Claim 21 patentably distinguishes the present invention over the cited art. Dependent Claim 21 is also allowable at least for the reasons described above regarding independent Claim 21, and by virtue of its dependency upon independent Claim 21. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claim 23

The Action rejected claims 27-29 under 35 U.S.C. § 103(a) as being unpatentable over *Yamakita* in view of U.S. Patent No. 6,519,603 to Bays, et al. (hereinafter *Bays*) in further view of *Szabo*. Claim 27 has been amended, and Applicant respectfully submits that the amendments overcome this rejection and add no new matter.

Claim 27 recites a computer-implemented method for determining a semantic category of a string in an electronic document based upon a mode bias schema comprising, *inter alia*, retrieving a mode bias schema and an associated grammar, the mode bias schema associated with a hierarchical based schema registry, wherein the retrieving of the mode bias schema uses a ranked list of mode bias schemas associated with an input method.

Bays discloses a method and apparatus for capturing annotations about database material in a way that allows queries with conditions or predicates on both the database material and the annotations. (*See Bays* column 2, lines 10-14.) Database material may be text, graphics, spreadsheets, relational tables or any other material which may be stored and indexed. (*See Bays* column 2, lines 14-16.) An annotatable data item (i.e. the subsection of database material that can be annotated) is any entity referenced by an index (e.g. by an object identifier) or any attribute or subcomponent of such an entity, or any arbitrary set of such items. (*See Bays* column 2, lines 16-20.) *Bays* also discloses that annotations may be captured in structured form to enhance queryability and semantic interpretation as well as to provide some order for users to enter this additional information content. (*See Bays* column 2, lines 47-50.)

The combination of *Yamakita*, *Bays*, and *Szabo* at least fails to teach or suggest retrieving a mode bias schema and an associated grammar, the mode bias schema associated with a hierarchical based schema registry, wherein the retrieving of the mode bias schema uses a ranked list of mode bias schemas associated with an input method, as recited in Claim 27. While *Bays* may mention a semantic interpretation, *Bays* fails to teach or suggest using a ranked list of mode bias schemas associated with an input method because *Bays* is directed to capturing annotations, not determining a semantic category based on a mode bias schema. Accordingly, independent Claim 27 patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of Claim 27. Dependent Claims 28-30 are also allowable at least for the reasons described above regarding independent Claim 27, and by virtue of their dependency upon independent Claim 27. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claims 28-30.

The Action rejected claim 30 under 35 U.S.C. § 103(a) as being unpatentable over *Yamakita* in view of *Bays*, in view of *Szabo* and further in view of U.S. Patent No. 6,182,029 to Friedman (hereinafter *Friedman*). Claim 27 has been amended, and Applicant respectfully submits that the amendments overcome this rejection and add no new matter.

As mentioned above, the combination of *Yamakita*, *Bays*, and *Szabo* fails to teach or suggest all the limitations of Claim 27. Accordingly, Dependent Claim 30 is also allowable over the combination of *Yamakita*, *Bays*, and *Szabo* at least for the reasons described above regarding independent Claim 27 and by virtue of its dependency upon independent Claim 27.

Friedman discloses a natural language processing system for extracting information from a natural language document input that can be easily adapted for use in a variety of areas of expertise by modifying, if necessary, one or more corresponding knowledge components. (See *Friedman* column 4, lines 49-53.) *Friedman* also discloses a document tagging schema that uses a document structure based on Extensible Markup Language (XML), a subset of Standard Generalized Markup Language (SGML), designed for ease of implementation and interoperability with SGML and HTML standards used by most Internet web browsers. (See *Friedman* column 12, lines 21-28.).

The combination of *Yamakita*, *Bays*, *Szabo*, and *Friedman* at least fails to teach or suggest retrieving a mode bias schema and an associated grammar, the mode bias schema associated with a hierarchical based schema registry, wherein the retrieving of the mode bias schema uses a ranked list of mode bias schemas associated with an input method, as recited in Claim 27. *Friedman* merely discloses a system for extracting information from a natural language document, but fails to teach or suggest the retrieval of a mode bias schema using a ranked list of mode bias schemas associated with an input method. (See *Friedman* column 4, lines 49-53.) In addition, Applicant submits that the use of four references as a basis for obviousness to reject Claim 30 suggest that Claim 30 is unobviousness. Accordingly, independent Claim 27 patentably distinguishes the present invention over the cited art. Dependent Claim 30 is also allowable at least for the reasons described above regarding independent Claim 27, and by virtue of its dependency upon independent Claim 27. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent Claim 30.

CONCLUSION

A request for a three-month extension of time is requested for the period of January 10, 2007 through April 10, 2007, and is submitted with this amendment.

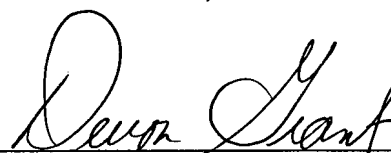
In view of the foregoing amendments and remarks, Applicants respectfully submits that the present application is in condition for allowance. Reconsideration and reexamination of the application and allowance of the claims at an early date are hereby solicited. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact the applicant's undersigned attorney at the number below.

Respectfully submitted,

MERCHANT & GOULD, LLC

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By:



Devon K. Grant
Reg. No. 57,036

MERCHANT & GOULD, LLC
P.O. Box 2903
Minneapolis, Minnesota 55402-0903
(404) 954-5100

27488

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